## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN

DONALD J. TRUMP FOR PRESIDENT, INC., MATTHEW, SEELY, ALEXANDRA SEELY, PHILIP O'HALLORAN, ERIC OSTERGREN, MARIAN SHERIDAN, MERCEDES WIRSING, and CAMERON TARSA,

No. 1:20-cv-01083

Plaintiffs,

Judge Janet T. Neff

v.

JOCELYN BENSON, in her official Capacity as Michigan Secretary of State, MICHIGAN BOARD OF STATE CANVASSERS, WAYNE COUNTY, MICHIGAN, and WAYNE COUNTY BOARD OF COUNTY CANVASSERS,

Defendants.

## W.D. MICH. LCIVR 7.3(b)(ii) CERTIFICATE OF WORD COUNT

Pursuant to W.D. Mich. LCivR 7.3(b)(ii), the undersigned counsel certifies that the brief filed in support of the motion to intervene by Proposed Intervenor City of Detroit consists of 2,182 words.

November 16, 2020

Respectfully submitted,

## FINK BRESSACK

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